

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION**

IN RE:

**KRISTY A. SAMS
DEBTOR**

}
}

CASE NO. 18-90848-BHL-13

**MOTION TO MODIFY DEBTOR'S CHAPTER 13 PLAN
AND NOTICE OF OBJECTION DEADLINE**

Comes now the above-captioned Debtor by Counsel, and files his Motion to Modify Debtor's Chapter 13 Plan. In support of this Motion, Counsel for the Debtor states as follows:

1. The Debtor is working with Freedom Mortgage Corporation on a pro se loan modification. The Debtor is delivering trial period payments to Freedom Mortgage Corporation in the amount of \$773.78 direct for February, March and April, 2019 payments. The Debtor proposes to allow continuing modified mortgage payments in the amount of \$773.78 per month to be paid inside of the plan commencing with the May, 2019 mortgage payment. The Debtor understands that a second Motion to Modify the plan maybe required at that time for the accurate modified mortgage payments. The arrearages will be cured in the final loan modification.
2. The Debtor proposes to allow an administrative claim held by Freedom Mortgage Corporation in the amount of \$450.00 for proof of claim/attorney fees.
3. The Debtor proposes to surrender her interest in a 2000 Chrysler Sebring to Napoleon State Bank. The vehicle is no longer operational. The Debtor proposes to strike the secured claim filed by Napoleon State Bank.
4. The Debtor proposes to surrender her interest in a 2006 Chevrolet Trailblazer to OneMain Financial Services. The vehicle is no longer operational. The Debtor proposes to strike the secured claim filed by OneMain Financial Services.
5. The Debtor has received consent to purchase a replacement vehicle.
6. The Debtor proposes to cure any pending plan delinquency through and including February, 2019 by the reduction of the base amount of her plan after surrendering said vehicle.

WHEREFORE, the Debtor, by Counsel, requests the Court to modify her plan by decreasing her payments to \$152.14 per month commencing in March, 2019 then will increase to \$1,003.30 per month commencing in April, 2019.

Dated this 14th day of March, 2019.

KOEHLER LAW OFFICE

By: 

Lloyd E. Koehler

Attorney No. 15669-98

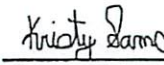
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KRISTY A. SAMS

NOTICE IS GIVEN THAT any Objection must be filed with the Bankruptcy Clerk within **21 days** from the date of service [or such other time period as may be permitted by Fed.R.Bankr.P.9006(f)]. Those not required or not permitted to file electronically must deliver any objection by U.S. mail, courier, overnight/express mail, or in person at:

U.S. Bankruptcy Court
110 U.S. Courthouse
121 W. Spring Street
New Albany, Indiana 47150

The objecting party must ensure delivery of the objection to the party filing the motion, (the Trustee – if not the movant or the objector) (and the Debtor – if not the movant or the objector). **If an objection is NOT timely filed, the requested relief may be granted.**

CERTIFICATE OF SERVICE

The undersigned certifies that on the 14th day of March, 2019 a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Joseph M. Black, Jr., Chapter 13 Trustee: jmblackcf@trustee13.com

U.S. Trustee: ustpreion10.in.ecf@usdoj.gov

I further certify that a true copy of the foregoing Motion to Modify was sent via U.S. Mail this 14th day of March, 2019 to all parties attached hereto:


LLOYD E. KOEHLER

Label Matrix for local noticing
0756-4

Case 18-90848-BHL-13
Southern District of Indiana
New Albany
Thu Mar 14 07:55:14 EDT 2019

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U.S. Department of Justice
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Creditonebnk
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Freedom Mortgage Corporation
Bankruptcy Department
10500 Kincaid Drive
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Fishers, IN 46037-9764

I C System
Po Box 64378
Saint Paul, MN 55164-0378

LVNV Funding, LLC
c/o Resurgent Capital Services
P.O. Box 10587
Greenville, SC 29603-0587

OneMain
PO Box 3251
Evansville, IN 47731-3251

Quantum3 Group LLC as agent for
Comenity Bank
PO Box 788
Kirkland, WA 98083-0788

Ally Bank
PO Box 130424
Roseville, MN 55113-0004

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Office of Joseph M. Black, Jr.
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PO Box 788
Kirkland, WA 98083-0788

Ally Fincl
P.o. Box 380901
Bloomington, MN 55438-0901

CW Nexus Credit Card Holdings 1, LLC
Resurgent Capital Services
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Greenville, SC 29603-0368

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Fst Premier
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Napoleon Bk
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Jefferson Capital Systems LLC Assignee
Po Box 7999
Saint Cloud Mn 56302-7999

Recmgmtpart
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Greensburg, IN 47240-3251

Rumpke Consolidated Companies, Inc.
10795 Hughes Road
Cincinnati, OH 45251-4598

SANTANDER CONSUMER USA, INC.
P.O. BOX 560284
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Santander
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Molly Slutsky Simons
Sottile & Barile
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Loveland, OH 45140-8362

The Napoleon State Bank
P. O. Box 9
Napoleon, IN 47034-0009

U.S. Attorney's Office
10 W Market St Ste 2100
Indianapolis, IN 46204-1986

U.S. Department of Education
c/o FedLoan Servicing
P.O. Box 69184
Harrisburg, PA 17106-9184

U.S. Trustee
Office of U.S. Trustee
101 W. Ohio St.. Ste. 1000
Indianapolis, IN 46204-1982

Verizon
by American InfoSource as agent
PO Box 248838
Oklahoma City, OK 73124-8838

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Capital One
15000 Capital One Dr
Richmond, VA 23238

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Freedom Mortgage Corporation

End of Label Matrix	
Mailable recipients	39
Bypassed recipients	1
Total	40